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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

SEP 22 1987

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SUBJECT:

ACTION MEMORANDUM - Ceiling Increase Request for the Removal Action
at Dayton Tire & Rubber Co., Dayton, Ohio (Site Spill ID# 9A)

FROM:

Robert W. Bowlus, On-Scene Coordinator
Emergency Response Section

TO:

Valdas V. Adamkus
Regional Administrator

THRU:

Basil G. Constantelos, Director
Waste Management Division

PURPOSE

The purpose of this memorandum is to confirm the verbal approvals given by Mr. Covington on April 15, 1987, to expend an additional \$40,000.00, and on April 17, 1987, to expend an additional \$200,000.00, which would secure the site and determine the extent of contamination. These verbal approvals raised the total project ceiling to \$290,000.00. The actions were necessary to control a release of polychlorinated biphenyls (PCB) from the Dayton Tire and Rubber Company in Dayton, Ohio. This memorandum will also report on actions taken to date at the site.

BACKGROUND

On April 3, 1987, the Ohio Environmental Protection Agency (OEPA) reported that there had been a release of up to 1,600 gallons of oil from four large transformers near Wolf Creek in Dayton, Ohio. Wolf Creek is a tributary to the Great Miami River. The transformers were at the site of the Dayton Tire Company, which went out of business during 1980. The area around the transformers was saturated with oil, and a slick was on the stream. The concentration of PCB in the oil was 22,900 parts per million (ppm). The OEPA had hired a Contractor, Leston Sewer Company, who boomed the stream and started to skim oil. It was clear that the response would require more than the \$10,000 that the OEPA was authorized to spend. Therefore, the OEPA requested assistance from the United States Environmental Protection Agency (U.S. EPA).

The On-Scene Coordinator (OSC), Robert W. Bowlus, was dispatched and arrived on-scene during the evening of April 3, 1987. He was verbally authorized to expend up to an additional \$40,000. The Technical Assistance Team (TAT) contractor responded to assist the OSC, and the Emergency Response Cleanup Services (ERCS) contractor, PEI Associates, was activated. O.H. Materials Company responded as the subcontractor for PEI, since the scope of the response was beyond the resources of the Leston Sewer Company.

The stream was boomed, but some oil escaped since the water was high. The sediments are believed to be contaminated up to a mile downstream. Over 200 gallons of free oil were recovered from around the transformers, and seventy 55-gallon drums of oil/water were recovered from the stream. Oil was no longer entering the stream, but precipitation could cause a further discharge, so the booms were left in place.

The OSC found that there are many more transformers and capacitors inside the Dayton Tire and Rubber Company building and on its roof. Many have been drained, and there is a substantial amount of PCB oils on the floors of the building. The building also contains a substantial quantity of asbestos-lined piping in poor condition. There is considerable evidence of vandalism in the building. Due to the unanticipated widespread contamination found in the building, the cost of characterizing and controlling the site was greater than estimated. The OSC requested an additional \$10,000, which was verbally approved by Mr. Covington, Deputy Regional Administrator, on April 7, 1987.

The Dayton Tire Company facility is a large four-story building, approximately 1,000 feet long and 500 feet wide. It contains 37 large transformers, most of which were PCB transformers, and over 50 large capacitors which contain very high concentrations of PCB. There are eight 12,000-gallon storage tanks in the basement, three buried railroad tank cars containing sludges, many large mixing vats, and approximately one hundred 55-gallon drums whose contents are, as yet, unknown. It also contains thousands of feet of 12" and 8" steam lines which were insulated. Much of this insulation has been torn down by scavengers. A team expert in asbestos removal collected ten samples of this material, and found seven to be primarily asbestos, and three to be primarily fiberglass with asbestos layers. This material is friable and is clearly a source of airborne asbestos fibers. Some of it has been crushed by vehicles driven into the building by scavengers.

On April 14, 1987, the OSC returned to the site because precipitation had caused additional oil discharges to the stream. On April 15, 1987, an additional \$40,000 was verbally approved by the Deputy Regional Administrator to control these new discharges. These new discharges could not be attributed to drained transformers, so a search was made to determine the source. A large network of underdrains and sewers, with a small pump station which drains the area beneath and around the building, was found. This system is heavily contaminated and will discharge oil whenever there is significant precipitation.

On April 17, 1987, an additional \$200,000 was verbally approved by the Deputy Regional Administrator to control discharges from the drainage system, initiate cleanup of the building, and complete extent of contamination surveys.

The Dayton Tire and Rubber Company site is not on the National Priorities List (NPL).

PRESENT STATUS

Several sections of discharge pipe leading to Wolf Creek have been removed to prevent discharges to the creek. The pump station is being used for storage of runoff from the under drain system. This runoff has been minimized by sealing as many entrances as possible including all roof drains. Runoff from the site has been directed so that it avoids areas contaminated by PCB. Sufficient extent of contamination work has been completed so that a statement of work for a site specific cleanup contract can be developed. Site security is being maintained by 24-hour guard service.

THREAT

Section 300.65 of the National Contingency Plan (NCP) authorizes a removal action where there are "Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals or food chain," and where there are "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate." PCBs are persistent hazardous substances, capable of causing both short-term and long-term local and systemic health effects in humans. They are known to bioaccumulate in the food chain and are suspected human carcinogens.

Fires on-site by scavengers in burning off the electrical insulation within the building has created dioxins and furans. The extent of this contamination must be more fully determined.

Airborne asbestos is a human carcinogen.

ENFORCEMENT

The Dayton Tire and Rubber Company was a wholly owned subsidiary of Firestone Tire & Rubber Co., when it went out of business. The site was sold to J-V Properties during July 1981. Machinery Merchants Inc., is in the process of selling the tire making equipment, which has considerable value. J-V Properties and Machinery Merchants have partners in common. The property itself, which is in metropolitan Dayton, also has considerable value. Unilateral Administrative Orders will be issued to all of the potential responsible parties.

FUTURE ACTIONS

PCB contaminated sediments will be removed from Wolf Creek and stored on the Dayton Tire and Rubber Company site for ultimate disposal. This work will be done on an immediate basis using the ERCS contract in order to minimize downstream migration of the contaminants. A site specific competitive procurement will be conducted for the decontamination of the building and the disposal of loose asbestos and PCB or dioxin contaminated materials including the sediments from Wolf Creek. This action will exceed the \$2,000,000 limit on removals and will require waiver of this limitation by the Assistant Administrator.

All of the actions taken to date have been designed to accommodate a long-term remedial action on the site and are thus consistent with potential long-term remedial actions for the site.

COSTS

The estimated costs are as follows:

	Approved Ceiling Per 4/16/87 Action Memo	Increment Verbally Approved 4/14/87	Increment Verbally Approved 4/17/87	Verbally Approved Total Ceiling
Cleanup Contractor	\$50,000	\$40,000	\$160,000	\$250,000
Contingency	-0-	-0-	40,000	40,000
<u>Subtotal</u>	<u>\$50,000</u>	<u>\$40,000</u>	<u>\$200,000</u>	<u>\$290,000</u>
<u>TAT</u>	<u>-0-</u>	<u>-0-</u>	<u>-0-</u>	<u>-0-</u>
Extramural Subtotal	\$50,000	\$40,000	\$200,000	\$290,000
Extramural Contingency (15%)	-0-	-0-	-0-	-0-
=====	=====	=====	=====	=====
EXTRAMURAL TOTAL	\$50,000	\$40,000	\$200,000	\$290,000
U.S. EPA Direct Costs	-0-	-0-	-0-	-0-
U.S. Indirect Costs	-0-	-0-	-0-	-0-
=====	=====	=====	=====	=====
INTRAMURAL TOTAL	-0-	-0-	-0-	-0-
PROJECT TOTAL	\$50,000	\$40,000	\$200,000	\$290,000

REGIONAL RECOMMENDATION

Because conditions at the Dayton Tire and Rubber Company site meet the NCP §300.65 criteria for a removal action, I recommend you confirm your earlier verbal approvals for this removal action. The estimated project costs as verbally approved total \$290,000, of which all were committed to the extramural cleanup contractor. You may indicate your approval or disapproval by signing below,

APPROVED: Walden J. Adams
REGIONAL ADMINISTRATOR

DATE: 9/23/87

DISAPPROVED: _____
REGIONAL ADMINISTRATOR

DATE: _____

Attachment

23 SEP 1987

DM

9/2

bcc: B. Hamm, WH-548B
C. Anderson, PM-214F
M. Elam/L. Johnson, 5CS-TUB
N. Niedergang/P. Le Blanc, 5HE-12
W. Reynolds, 5PA-14
R. Buckley, 5HR-G1

RWB:mw:disk #12:9-2-87:5HR-11/ERS

FUNDING HISTORY FOR DAYTON TIRE AND RUBBER COMPANY SITE

	<u>Verbal Approval 4/3/87</u>	<u>Increment Verbally Approved 4/7/87</u>	<u>Project Ceiling RA signed AM 4/16/87</u>	<u>Increment Verbally Approved 4/15/87</u>	<u>Increment Verbally Approved 4/17/87</u>
Cleanup Contractor	\$40,000	\$10,000	\$50,000	\$40,000	\$160,000
Contingency	-0-	-0-	-0-	-0-	40,000
<u>Subtotal</u>	<u>\$40,000</u>	<u>\$10,000</u>	<u>\$50,000</u>	<u>\$40,000</u>	<u>\$200,000</u>
TAT	-0-	-0-	-0-	-0-	-0-
<u>Extramural Subtotal</u>	<u>\$40,000</u>	<u>\$10,000</u>	<u>\$50,000</u>	<u>\$40,000</u>	<u>\$200,000</u>
Extramural Contingency ¹ (15%)	-0-	-0-	-0-	-0-	-0-
=====	=====	=====	=====	=====	=====
EXTRAMURAL TOTAL	\$40,000	\$10,000	\$50,000	\$40,000	\$200,000
U.S. EPA Direct Cost	-0-	-0-	-0-	-0-	-0-
U.S. EPA Indirect Cost	-0-	-0-	-0-	-0-	-0-
=====	=====	=====	=====	=====	=====
INTRAMURAL TOTAL	-0-	-0-	-0-	-0-	-0-
PROJECT TOTAL	\$40,000	\$10,000	\$50,000	\$40,000	\$200,000

¹Note: This extramural contingency could be allocated as needed prorated between the cleanup contractor and TAT.

FUNDING HISTORY FOR YTON T AND RUBBER COMPANY SI (cont.)

<u>Project Ceiling Clarification per this RA signed AM</u>	<u>Ceiling Increase Per RA signed AM 7/6/87</u>	<u>Project Ceiling Per RA signed AM 7/6/87</u>	<u>Ceiling Increase Per AA signed, AM 9/8/87</u>	<u>Project Ceiling per AA signed AM 9/8/87</u>
\$250,000	\$318,000	\$568,000	\$2,216,000	\$ 2,784,000
40,000	47,600	87,600	350,000	437,600
<u>\$290,000</u>	<u>\$365,600</u>	<u>\$655,600</u>	<u>\$2,566,000</u>	<u>\$3,221,600</u>
-0-	41,400	41,400	125,000	166,400
<u>\$290,000</u>	<u>\$407,000</u>	<u>\$697,000</u>	<u>\$2,691,000</u>	<u>\$3,388,000</u>
-0-	-0-	-0-	403,000	403,000
=====	=====	=====	=====	=====
\$290,000	\$407,000	\$697,000	\$3,094,000	\$3,791,000
-0-	\$ 36,000	\$ 36,000	\$ 132,000	\$ 168,000
-0-	73,000	73,000	244,000	317,000
=====	=====	=====	=====	=====
-0-	\$109,000	\$109,000	\$ 376,000	\$ 485,000
\$290,000	\$516,000	\$806,000	\$3,470,000	\$4,276,000